

Exhibit 15

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

FAIRFIELD SENTRY LIMITED, et al.,

Debtors in Foreign Proceedings.

Chapter 15 Case

Case No. 10-13164 (CGM)

Jointly Administered

FAIRFIELD SENTRY LIMITED (IN LIQUIDATION), et al.,

Plaintiffs,

against –

THEODOOR GGC AMSTERDAM, et al.,

Defendants.

Adv. Pro. No. 10-3496

(CGM)

Administratively

Consolidated

FAIRFIELD SENTRY LIMITED (IN LIQUIDATION), et al.,

Plaintiffs,

– against –

ABN AMRO SCHWEIZ AG a/k/a ABN AMRO
(SWITZERLAND) AG, et al.,

Adv. Pro. No. 10-3635

Adv. Pro. No. 10-3636

(CGM)

Defendants.

STIPULATION

Consolidated Plaintiffs,¹ Centrum Bank Aktiengesellschaft (“Centrum”), and Verwaltungs-und Privat-Bank Aktiengesellschaft (“VP Bank AG”) (together, “the parties”), by and through undersigned counsel, state as follows:

WHEREAS, at a conference held on April 21, 2021, the Court ruled that any Defendant wishing to move to dismiss under Rule 12(b)(5) of the Federal Rules of Civil Procedure must preserve the right to make the motion on the record at the same conference and must move by May 21, 2021;

WHEREAS, at the April 21, 2021 conference, the Court permitted discovery on service issues, as stated in the transcript, as to any entity that moved to dismiss under Rule 12(b)(5);

WHEREAS, on May 21, 2021, Centrum and VP Bank AG moved to dismiss the complaints in adversary proceedings 10-3635 and 10-3636 under Rule 12(b)(5) of the Federal Rules of Civil Procedure and Rule 7012(b) of the Federal Rules of Bankruptcy Procedure (Dkt. 3766, 3769);

WHEREAS, on May 27, 2021, Consolidated Plaintiffs served Requests for Production and Notices of Rule 30(b)(6) Depositions on Centrum and VP Bank AG;

IT IS HEREBY STIPULATED AND AGREED THAT:

1. VP Bank AG learned of the litigation filed by the Liquidators in the United States to recover redemption payments in connection with the Fairfield funds (the “Litigation”) in or around August 2010, receiving a copy of the complaints sent by the Liquidators’ counsel, Brown Rudnick LLP (“Brown Rudnick”), to VP Bank AG’s offices in Liechtenstein via international

¹ “Consolidated Plaintiffs” are Kenneth Krys and Greig Mitchell (or their predecessors) as Liquidators and Foreign Representatives of all three funds—Fairfield Sentry Limited (In Liquidation), Fairfield Sigma Limited (In Liquidation), and Fairfield Lambda Limited (In Liquidation).

registered mail. VP Bank AG also received a copy of the summons sent by Citco via fax in August 2010.

2. VP Bank AG retained the law firm of Fried, Frank, Harris, Shriver & Jacobson LLP (“Fried Frank”), located at One New York Plaza, New York, New York 10004, to represent it in connection with the Litigation in or around August 2010, and Fried Frank first appeared (reserving all issues of personal jurisdiction and service of process) on VP Bank AG’s behalf in the Litigation in October 2010.

3. VP Bank AG retained Fried Frank to provide legal advice and, to the extent necessary or appropriate, take actions to protect its legal interests (including its defense) in connection with the Litigation. Fried Frank has continued to represent VP Bank AG in the Litigation through the present.

4. Centrum learned of the Litigation in or around August 2010, receiving a copy of the complaints that the Liquidators’ counsel, Brown Rudnick, sent to Centrum’s offices in Liechtenstein via international registered mail.

5. Centrum retained the law firm of Withers Bergman LLP (“Withers”), located at 430 Park Avenue, New York, New York 10022, to represent it in connection with the Litigation in or around late 2010 or early 2011. Centrum retained Withers to provide legal advice and, to the extent necessary or appropriate, take actions to protect its legal interests (including its defense) in connection with the Litigation.

6. Centrum was acquired by VP Bank AG in 2015 and, following the acquisition, no longer exists as a separate entity.

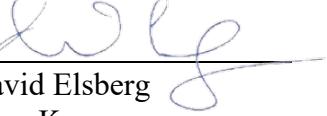
7. Withers continued to represent Centrum in the Litigation until July 2016, when (in light of Centrum’s acquisition by VP Bank AG), Withers withdrew and Fried Frank filed a

stipulation of substitution of counsel in the Litigation replacing Withers as counsel for Centrum in the Litigation. Fried Frank has continued to represent Centrum in the Litigation since then.

8. The foregoing is based on a review of documents located by VP Bank AG after a reasonably diligent search.

[Remainder of Page Intentionally Left Blank]

Dated: New York, New York
July 21, 2021

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Dated: New York, New York
July 21, 2021

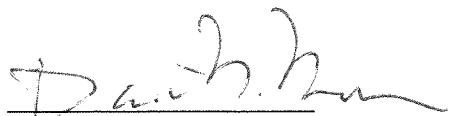
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